

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Angela Cephas	:	Chapter 13
	:	Case No. 22-10183-ELF
Debtor(s)	:	

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY PENNYMAC LOAN SERVICES, LLC.

Debtor, Angela Ortiz, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by PNC Bank, National Association hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtor avers payments were not properly applied.
7. Debtor opposes the same.
8. Denied. Debtor requests strict proof of the same.
9. Denied.
10. No response required.

WHEREFORE, Debtor, by and through the undersigned counsel, respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

/s/ Brad J. Sadek, Esq.

Dated: August 16, 2022

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1500 JFK Boulevard Suite #220
Philadelphia, PA 19102
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Rebecca A. Solarz, Esq.
Attorney for Movant *PNC Bank, National Association*
Electronic Notice to *bkgroup@kmlawgroup.com*

Dated: August 16, 2022

/s/Brad J. Sadek, Esq
Brad J. Sadek, Esq.
Attorney for Debtor
1500 JFK Boulevard Suite #220
Philadelphia, PA 19102